

Decision **PROPOSED DECISION OF COMMISSIONER FLORIO** (Mailed 10/6/2015)**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Revise and Clarify  
Commission Regulations Relating to the Safety of  
Electric Utility and Communications Infrastructure  
Provider Facilities

Rulemaking 08-11-005  
(Filed November 6, 2008)

**DECISION DENYING COMPENSATION TO THE UTILITY REFORM NETWORK  
FOR FAILURE TO MAKE A SUBSTANTIAL CONTRIBUTION TO  
DECISION 14-02-015**

<b>Claimant: The Utility Reform Network(TURN)</b>	<b>For contribution to D.14-02-015<sup>1</sup></b>
<b>Claimed: \$26,016.30</b>	<b>Awarded: \$0.00 (reduced 100%)</b>
<b>Assigned Commissioner: Michel Peter Florio</b>	<b>Assigned ALJ: Timothy Kenney</b>

**PART I: PROCEDURAL ISSUES**

<b>A. Brief Description of Decision:</b>	The decision revises General Order (GO) 95 to incorporate new and modified rules to reduce the fire hazards associated with overhead power lines and aerial communication facilities in close proximity to power lines.
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**B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:**

	<b>Claimant</b>	<b>CPUC Verified</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference (PHC):	No PHC	1/21/2015
2. Other Specified Date for NOI:	2/19/2009	Verified.
3. Date NOI Filed:	2/19/2009	Verified.
4. Was the NOI timely filed?		Yes.

<sup>1</sup> The claim erroneously states that TURN seeks compensation for contribution to Decision (D.) 13-10-019. The correct decision is D.14-02-015, as noted in PART I.A.13, of the request.

Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.08-11-005	Verified
6. Date of ALJ ruling:	3/10/2009	Verified
7. Based on another CPUC determination (specify):	NA	N/A
8. Has the Claimant demonstrated customer or customer-related status?		Yes
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A.07-12-021	Verified
10. Date of ALJ ruling:	4/18/2008	Verified
11. Based on another CPUC determination (specify):	NA	N/A
12. Has the Claimant demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.14-02-015	Verified
14. Date of Issuance of Final Order or Decision:	02/10/14	Verified
15. File date of compensation request:	04/11/14	Verified
16. Was the request for compensation timely?		Yes

## PART II: SUBSTANTIAL CONTRIBUTION

**A. In the fields below, describe in a concise manner Claimant’s contribution to the final decision (see § 1802(i), § 1803(a) & D.98-04-059).**

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<b>Costs</b> TURN was the only party to specifically raise the issue of the costs of the Fire Incident data collection effort (Technical Panel 2). TURN requested the IOUs to provide estimates of costs for data collection at the workshop. The estimates were included in the Phase 3 Workshop Report (C-4) and were the only actual cost estimates included in the	Comments of The Utility Reform Network on R.08-11-005 Phase 3 Technical Panel Report, filed October 23, 2012, p. 2.  <i>See</i> Phase 3 Joint Parties’ Workshop Report for Workshops Held January – March 2013, Appendix C. D.14-02-015, p. 83.	Not accepted, <i>see</i> <b>Additional Comments on Part II</b> , Costs. <b>(1)</b> The IOU’s were required by the Scoping Memo to include cost data for the proposed Fire Data Plan in the Workshop Report. ( <i>See</i> June 1, 2012 Scoping Memo at 10). The fact that TURN asked the IOUs to provide cost data at the workshop had no bearing on whether the IOUs would eventually provide cost data.

<p>final decision. The decision specifically looked to these estimates to determine that the startup costs for the data collection effort would be relatively small.</p>		<p>(2) TURN never took a position about the cost of the Fire Data Plan or any other aspect of the Fire Data Plan.</p> <ul style="list-style-type: none"> <li>• TURN took no position in the Workshop Report (See May 8, 2013 Workshop Report at C-7).</li> <li>• TURN did not file briefs or reply briefs on the Workshop Report (See, D.14-02-015 at 10-11), and TURN did not file comments on the PD (<i>Id.</i> at 91). TURN's only contribution to the formal record leading to D.14-02-015 was its reply comments on the PD (<i>Id.</i> at 91-92), wherein TURN did not address the Fire Data Plan.</li> <li>• There is no mention in D.14-02-015 of TURN's position with respect to any aspect of the Fire Data Plan.</li> </ul>
<p><b>PD</b></p> <p>In the PD, the Commission ordered all entities subject to GO 95 to design and construct their facilities in accordance with the standard established in Rule 48. This order required wood poles in Light Loading Districts to be designed and constructed so they would not fail at wind loads of 112mph (degrade to 92 mph) regardless of the specific characteristics</p>	<p>Proposed Decision of Commissioner Florio, mailed November 19, 2013, at 68.</p> <p>Reply Comments of The Utility Reform Network on</p>	<p>Not accepted; see <b>Additional Comments on Part II</b>, TURN's Reply Comments on the PD - Implementation and Consideration of GO 95, Rule 48.</p>

<p>and fire potential of the location.</p> <p>TURN argued the Commission should delay consideration and implementation of GO 95, Rule 48 (specifically the “multiply by” provision) until the fire threat maps are completed in Track 3. TURN argued that, once the fire threat maps are created, it will be possible to compare and contrast the cost impacts of different standards across utility service territories or targeted implementation of such rules to specific fire threat areas.</p> <p>In response, the Commission agreed with TURN and other parties and modified the PD to defer consideration of proposed revisions to the “multiply by” provision to Phase 3, Track 3 of this proceeding.</p>	<p>the Proposed Decision in Phase 3, Tracks 1 and 2 of Rulemaking 08-11-005, at 3.</p> <p>D.14-02-015, at 68 (“Consistent with the recommendations made by several parties in their comments on the Proposed Decision, we will defer our consideration of proposed revisions to the “multiply by” provision to Phase 3, Track 3 of this proceeding.”)</p>	
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**B. Duplication of Effort (§§ 1801.3(f) & 1802.5):**

	<b>Claimant</b>	<b>CPUC Verified</b>
<b>a. Was the Division of Office of Ratepayer Advocates (ORA)<sup>2</sup> a party to the proceeding?</b>	Yes	Yes.
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes	Yes.
<b>c. If so, provide name of other parties:</b> Safety and Enforcement Division (SED), Mussey Grade Road Alliance (“MGR”), Hans Laetz		Verified.
<b>d. Describe how you coordinated with ORA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:</b>		TURN’s formal participation was limited to reply

<sup>2</sup> The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

Due to the logistics of this proceeding, where the Commission requested all parties to comment on the same proposed rules on several occasions, and the sheer numbers of parties in this proceeding, coordinating with all parties to entirely avoid duplication of effort and viewpoints would have been nearly impossible. TURN's participation was limited to the issue of the reasonableness of the costs of rule changes to ratepayers, and TURN was the only party whose primary concern was cost to ratepayers.	comments on the PD wherein TURN did nothing more than agree with PG&E's and SCE's recommendation to defer consideration for Rule 48-related issues. TURN's justification for deferring Rule 48-related issues relied largely on the facts and arguments in PG&E's and SCE's opening comments on the PD. Consequently, TURN's formal participation duplicated, to a large degree, PG&E's and SCE's participation. TURN did not explain how its participation supplemented, complemented, or contributed to that of PG&E and SCE.
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**C. Additional Comments on Part II:**

#	Intervenor's Comment(s)	CPUC Discussion
1	Costs	Based on the above comments, there is no record of any formal participation or substantial contribution by TURN regarding the finding in D.14-02-015 that the startup costs for the adopted Fire Data Plan would be relatively small.
2	TURN's Reply Comments on the PD - Implementation and Consideration of GO 95, Rule 48.	The claimed substantial contribution lacks merit because TURN's recommendation in its reply comments on the PD to defer consideration of proposed revisions to the "multiply by" provision in Rule 48 was not original. Rather, TURN agreed with the deferral recommendation by Pacific Gas and Electric Company (PG&E) and Southern California Edison Company (SCE) in their opening comments on the PD. (TURN Reply Comments on the PD at pp.2-3.) TURN's "me too"

		recommendation added little to PG&E's and SCE's recommendation to defer consideration of Rule 48 issues.
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### PART III: REASONABLENESS OF REQUESTED COMPENSATION

#### A. General Claim of Reasonableness (§§ 1801 & 1806):

a. Intervenor's claim of cost reasonableness:	CPUC Verified
<p>Assigning a specific dollar value to TURN's participation in this proceeding is extremely difficult because this Rulemaking was intended to modify General Orders relating to utility electric and telecommunications lines and parties did not provide specific estimates of costs of the rule changes. Generally, though, to the extent that the Commission specifically invited any and all parties to respond to the OIR and participate in the discussions and workshops, the Commission may safely conclude that by speaking on behalf of residential ratepayers in a Rulemaking heavily dominated by both electric and telecommunications utilities that were amply represented at each of the workshops, TURN presented important customer issues that otherwise may not have been addressed even if it is difficult to assign a dollar value to those issues. For example, the Commission should find TURN's participation productive in part because it resulted in a significant discussion of the costs of data collection that otherwise may not have occurred. TURN's participation also ensured further scrutiny of a proposed rule change that would impact an enormous number of wood poles and prevented ratepayers from being saddled with millions in unnecessary costs.</p> <p>In the past, the Commission has acknowledged that assigning a dollar value to intangible benefits may be difficult, and the Commission should treat this compensation request as it has treated similar past requests with regard to the difficulty of establishing specific monetary benefits associated with TURN's participation.</p>	<p>TURN's claim lacks merit for the reasons stated in Item 2 above.</p> <p>TURN also claims that its participation was cost effective because, in part, TURN's participation "ensured further scrutiny of a proposed rule change that would impact an enormous number of wood poles and prevented ratepayers from being saddled with millions in unnecessary costs." TURN's claim overstates its contribution to D.14-02-015 for the reasons stated above.</p> <p><b>Additional Comments on Part II</b>, second bullet.</p>
<p><b>b. Reasonableness of Hours Claimed.</b></p> <p>TURN's hours in this compensation request reflect the complexity and breadth of this Rulemaking and encompasses work performed over three years. Participation in this Rulemaking was structured around collaborative workshops, workshop notes, technical panel reports and presentations, and comments on reports. Keeping abreast of all the components of this rulemaking required a fair amount of time for TURN's attorney. That being said, TURN's total hours are fairly modest given the size and scope of this proceeding because TURN focused on only limited issues.</p>	<p>TURN's claimed hours are not reasonable because TURN's sole contribution to the formal record that lead to D.14.02-015 was its reply comments on the PD. TURN's reply comments were limited to agreeing with the position expressed by PG&amp;E and SCE in their</p>

<p><u>TURN Attorneys</u></p> <p>Nina Suetake was TURN's lead attorney on this proceeding, and her hours in particular reflect the tasks required to participate in this Rulemaking including preparing for and participating in the workshops, reading the numerous rule changes proposed by all the parties, and drafting various comments. Ms. Suetake's hours also reflect time spent addressing the various substantive and procedural issues presented in the high volume of email traffic that was sent throughout this proceeding regarding proposed rule changes, procedural scheduling, and workshop notes and agendas.</p> <p>Robert Finkelstein provided input to Ms. Suetake to help assess whether TURN would file comments on the Proposed Decision.</p> <p><u>TURN Consultants</u></p> <p>Gayatri Schilberg, of JBS Energy, was TURN's energy consultant in this proceeding and assisted TURN in assessing the scope of TURN's involvement in this phase of the proceeding. On those issues addressed, Ms. Schilberg assisted Ms. Suetake in formulating TURN's positions. Ms. Schilberg was particularly invaluable to TURN's contribution to this proceeding because of her significant experience with pole replacement and inspections and vegetation management budgets and practices from the electric IOUs' GRCs.</p> <p><u>Compensation Request Preparation Time</u></p> <p>TURN is requesting compensation for 5 hours devoted to preparation of this request for compensation. TURN submits this is a reasonable amount of hours for a proceeding that required significant attention to monitoring activities, workshops, reports, and comments produced during the proceeding.</p>	<p>opening comments on the PD, and TURN's reply comments relied on facts and arguments presented by PG&amp;E and SCE in their opening comments. The many hours TURN spent at workshops and other activities over three calendar years were not essential to the preparation of TURN's reply comments that duplicated, to a large degree, PG&amp;E's and SCE's participation.</p>
<p><b>c. Allocation of Hours by Issue</b></p> <p>TURN has allocated all of our attorney and consultant time by issue area or activity, as evident on the attached timesheets. The following codes related to specific substantive issue and activity areas addressed by TURN. TURN also provides an approximate breakdown of the number of hours spent on each task and the percentage of total hours devoted to each category.</p> <p><b>General Participation (GP) – 41.46 hours, 49.84%</b></p> <p>General participation work essential to TURN's participation in this proceeding that typically spans multiple issues and/or would not vary with the number of issues that TURN addresses. This includes reading scoping memos, drafting of comments, reviewing Commission rulings, case management tasks, participating in prehearing workshops and all-party</p>	<p>Verified, but see comments regarding disallowances in III. D., <b>Reasonableness of Claimed Hours.</b></p>

meetings, and reviewing the Proposed decision, notices, and motions.	
<b>Cost of Rule Changes to Ratepayer (Cost) – 12.97 hours, 15.59%</b> Time spent on activities related to the cost of proposed rule changes.	
<b>Proposed Decision (PD) – 23.75 hours, 28.55%</b> Time spent on activities related to TURN's reply comments on the proposed decision including assessing TURN's position on the proposed decision, reviewing other party opening comments, drafting reply comments, and reading the final decision.	
<b>Compensation Request (Comp) – 5 hours, 6.01%</b> Time devoted to preparing the compensation request	

**B. Specific Claim:\*\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Nina Suetake	2012	26.5	\$315	D.13-08-022	\$8,347.50	0	Not set	\$0.00
Nina Suetake	2013	21.25	\$320	See comment 1	\$6,800.00	0	Not set	\$0.00
Nina Suetake	2014	22.25	\$345	See comment 1	\$7,676.25	0	Not set	\$0.00
Robert Finkelstein	2013	1.25	\$490	See comment 1	\$612.50	0	Not set	\$0.00
Robert Finkelstein	2014	1	\$490	See comment 1	\$490.00	0	Not set	\$0.00
Gayatri Schilberg	2012	3.55	\$205	D.13-08-022	\$727.75	0	Not set	\$0.00
Gayatri Schilberg	2013	2.38	\$210	See comment 2	\$499.80	0	Not set	\$0.00
Subtotal: \$25,153.80						Subtotal: \$0.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Nina Suetake	2014	5	175.5	½ 2014 rate, see comment 1	\$862.50	0	Not set	\$.00
Subtotal: \$862.50						Subtotal: \$0.00		
TOTAL REQUEST: \$26,016.30						TOTAL AWARD: \$0.00		
**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall								



be retained for at least three years from the date of the final decision making the award.

\*\*Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate

Attorney	Date Admitted to CA BAR <sup>3</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Robert Finkelstein	June 13, 1990	146391	No
Nina Suetake	December 14, 2004	234769	No

### C. Attachments Documenting Specific Claim and Comments on Part III

Attachment or Comment #	Description/Comment
Attach 1	<b>Certificate of Service</b>
Attach 2	<b>Daily Time Records for Attorneys and Experts</b>
Attach 3	<b>TURN Hours Allocated by Issue</b>
Comment 1	<p><b>Hourly Rates for TURN Attorneys</b></p> <p>TURN seeks hourly rates for its staff attorneys at levels that the Commission has previously adopted for each individual's work in a given year, or at an increased level for 2013 consistent with Resolution ALJ-278. The following describes the basis for the requested rates that have not been previously awarded as of the date of this Request for Compensation.</p> <p><u>Nina Suetake</u></p> <p>Consistent with the Cost-of-Living Adjustment authorized by Resolution ALJ-278, the hourly rate for Nina Suetake in 2013 is increased by 2.2% to \$320 (rounded to the nearest \$5 increment from \$321.93). TURN has previously requested this hourly rate for Ms. Suetake in its compensation request for A.07-06-031.</p> <p>For Ms. Suetake's 2014 rate, TURN asks the Commission to recognize that she is now in the 8-12 year experience band adopted in D.08-04-010, and that a \$340 hourly rate is appropriate given the move into this band. As the Commission recognized in D.08-04-010 (p.8), moving to a higher experience level is one of the circumstances that qualifies an intervenor with an existing rate for a rate increase.</p> <p>Ms. Suetake is a 2004 law school graduate. She became a staff attorney in the same year and has worked on regulatory matters before the CPUC since that time.</p> <p>TURN's showing here is similar in nature and quality to the showing made in support of a requested increase of \$25 to reflect the movement of Marcel Hawiger, another TURN staff attorney, from one experience tier to the next. (See. D.11-09-037). Should the Commission believe more or different information is warranted to provide further support for this request here, TURN requests that it be so notified and given the</p>

<sup>3</sup> This information may be obtained at: <http://www.calbar.ca.gov/>.

	<p>opportunity to supplement its showing.</p> <p><u>Robert Finkelstein</u></p> <p>Consistent with the Cost-of-Living Adjustment authorized by Resolution ALJ-278, the hourly rate for Robert Finkelstein in 2013 is increased by 2.2% to \$490 (rounded to the nearest \$5 increment from \$490.56). TURN has previously requested this hourly rate for Mr. Finkelstein in its compensation requests for A.10-12-005/006, and A.07-06-031.</p> <p>Due to the very minor number of hours (1 hour) in 2014 for Mr. Finkelstein and the fact that no resolution regarding 2014 COLA increases has been issued, TURN will apply Mr. Finkelstein's 2013 rate at this time. TURN reserves the right to request an adjustment to Mr. Finkelstein's 2014 rate in future compensation requests.</p>
Comment 2	<p><b>Hourly Rate for Gayatri Schilberg in 2013</b></p> <p>Consistent with the Cost-of-Living Adjustment authorized by Resolution ALJ-278, the hourly rate for Gayatri Schilberg in 2013 is increased by 2.2% to \$210.</p>
Comment 3	<p><b>Reasonableness of TURN's Expenses</b></p> <p>The Commission should find TURN's direct expenses reasonable. The expenses consist of photocopying expenses, including the costs of producing the hard copies of TURN's pleadings, telecommunications costs for calls related to this proceeding, and postage costs for mailing TURN pleadings. All costs are directly related to this proceeding and were necessary for TURN's participation in this proceeding.</p>

#### D. CPUC Disallowances and Adjustments:

Item	Reason
1. Failure to Provide Substantial Contribution to Costs Associated with the Fire Data Plan	<p>See Discussion in Part II. A. Substantial Contribution, Costs.</p> <p>There is no record of any formal participation or substantial contribution by TURN regarding the finding in D.14-02-015 that the startup costs for the adopted Fire Data Plan would be relatively small.</p>
2. Implementation and Consideration of GO 95, Rule 48.	<p>The claimed substantial contribution lacks merit because TURN's recommendation in its reply comments on the PD to defer consideration of proposed revisions to the "multiply by" provision in Rule 48 was not original. Rather, TURN agreed with the deferral recommendation by PG&amp;E and SCE in their opening comments on the PD. (TURN Reply Comments on the PD at 2-3.) TURN's recommendation added little to PG&amp;E's and SCE's recommendation to defer consideration of Rule 48 issues.</p>
3. Reasonableness of Claimed Hours	<p>We deny all of TURN's claimed hours.</p>

**PART IV: OPPOSITIONS AND COMMENTS**

<b>A. Opposition: Did any party oppose the Claim?</b>	No
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<b>Party</b>	<b>Reason for Opposition</b>	<b>CPUC Disposition</b>

<b>B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(2)(6))?</b>	No
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If not:

<b>Party</b>	<b>Comment</b>	<b>CPUC Disposition</b>
N/A	No comments filed.	N/A

**FINDINGS OF FACT**

1. TURN has not made a substantial contribution to Decision 14-02-015. No hourly rates are set in today's decision.

**CONCLUSIONS OF LAW**

1. The Claim, with any adjustment set forth above, fails to satisfy all requirements of Pub. Util. Code §§ 1801-1812.
2. This proceeding should be closed by this decision as there are no outstanding issues.

**ORDER**

1. The Utility Reform Network's claim for compensation for its participation in this proceeding is denied.
2. The comment period for today's decision is not waived.
3. This proceeding is closed.

This decision is effective today.

Dated \_\_\_\_\_, 2015, at San Francisco, California.

**APPENDIX****Compensation Decision Summary Information**

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	No
<b>Contribution Decision(s):</b>	D1402015		
<b>Proceeding(s):</b>	R0811005		
<b>Author:</b>	Timothy Kenney		
<b>Payer(s):</b>	None as the result of this Decision.		

**Intervenor Information**

<b>Intervenor</b>	<b>Claim Date</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
The Utility Reform Network (TURN)	04/11/2014	\$26,016.30	\$0.00	N/A	Failure to Provide Substantial Contribution.

**Advocate Information**

<b>First Name</b>	<b>Last Name</b>	<b>Type</b>	<b>Intervenor</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Nina	Suetake	Attorney	TURN	\$315	2012	Not Set
Nina	Suetake	Attorney	TURN	\$320	2013	Not Set
Nina	Suetake	Attorney	TURN	\$345	2014	Not Set
Robert	Finkelstein	Attorney	TURN	\$490	2013	Not Set
Robert	Finkelstein	Attorney	TURN	\$490	2014	Not Set
Gayatri	Schilberg	Expert	TURN	\$205	2012	Not Set
Gayatri	Schilberg	Expert	TURN	\$210	2013	Not Set

**(END OF APPENDIX)**